
Cloud Services Privacy Notice

Our privacy was last updated on August 31, 2022.

ComputerTalk is committed to protecting your privacy and managing your personal data in accordance with applicable data protection law. This Privacy Notice applies to Computer Talk Technology Inc. and Computer Talk Global Corp. and covers our processing activities as a Data Processor. It aims to be clear, concise, and transparent about how we collect, store, and use your personal data.

Who we are

ComputerTalk is a company incorporated in Canada, with its principal place of business at 150 Commerce Valley Drive West, Suite 800, Markham, Ontario, Canada, L3T 7X3. We are a global provider of enterprise-class contact centers and advanced interactive voice response (IVR) solutions powered by our proprietary ice software platform and application designer tool.

What data we collect about you

In connection with the use of the cloud services, personal data may be captured by or introduced into the services, the extent of which is determined and controlled by the Customer in its sole discretion and which may include, but is not limited to, the following categories of personal data:

- Name
- Date of birth
- Address
- Telephone number
- Email address
- Occupation
- Job title
- Company name and address
- ID data
- Professional life data
- Personal life data
- Connection data
- Localization data
- Originating phone number and display name (received from the voice carrier) for voice calls
- Email address and email display name for emails
- User-provided email address and name for webchats
- Originating identity for social media interactions (e.g., Facebook profile ID)
- Originating phone number and display name for SMS contacts



- Phone number or email address of an external transfer out of the ice contact center platform
- Other categories of data as configured or customized by the Data Controller

How we collect your data

The Customer solution collects the information we process from data subjects who intentionally interact with it or otherwise made available or introduced into the solution data environment through actions or directions of the Customer.

How we use your data and the legal basis for processing

Through a commercial agreement with ComputerTalk for the use of our services, our Customers provide consent for processing data pertaining to the customer's employees and the data of their end-user data subjects as specified by and at the sole discretion of each customer. Data subject information is processed and collected strictly for the performance of the contract we enter with each customer and based upon the following legitimate business interests:

- *For service management and operation.* The customer authorizes specific employees or agents to access the services by entering information specific to such individuals into the ice administration interface.
- *For statistics and reporting.* For the purpose of the customer's operational management of the services, ice provides a variety of statistical data on contact patterns, including tracking interactions from users or endpoints.
- *For service tracking and contact management.* ice provides tools for its users to search for previous interactions with the system based on the contact originator or destination, which allows them to follow up on previous interactions.
- *For customer-driven archival requirements.* Complete records of contact interactions may be retained and archived for periods specified by the customer to fulfill legal requirements as a legitimate purpose of their business.
- *For support and troubleshooting.* Retention of carrier data can be used to troubleshoot voice quality and messaging connectivity issues in the environment. This processing is necessary for facilitating and improving our services.

How we store your data

ComputerTalk securely stores Customer data in colocation data centers in Canada and the US, where data is securely kept following industry-standard security measures. ComputerTalk has taken appropriate technical and organizational measures to ensure we have mitigated such risks as loss or unauthorized access, destruction, use, and modification or disclosure of data.

How long do we retain your data

We will keep hold of your data for no longer than necessary. The length of time we retain it will depend on any legal obligations we have and the nature of any contracts we have in place with Customers.



On a default basis, voice recordings are archived for 90 days with backup to an encrypted cloud service. After 90 days, voice recordings are purged. Contact detail records and email records are retained for one year. For other contact modalities (e.g., webchat), retention of contact records is optional. All retention intervals are configurable. Once the retention period has expired, ComputerTalk follows industry-standard processes for the secure destruction of Customer Data that becomes obsolete or is no longer required under the Agreement.

Within 30 calendar days of termination of services, unless otherwise requested by the Customer, all information collected through the provision of services is securely deleted along with all other solution components dedicated to the Customer's services, including website(s), configuration data, or other data associated with those services.

Who we share your data with

ComputerTalk will not access or use Customer Data except as described in the Agreement, for the provision of services, or as instructed by the Customer. ComputerTalk will not disclose Customer Data to any government except as necessary to comply with the law or valid and binding order of a law enforcement agency (such as a subpoena or court order).

ComputerTalk may transfer data to its Affiliates and hire other companies to provide limited services on its behalf, such as assisting customer support. Any such Affiliates and Sub-processors will be permitted to obtain Customer Data only to deliver the services ComputerTalk has retained them to provide.

Transferring personal data

The Customer understands that the services provided by ComputerTalk sometimes require Customer Data to be transferred to a country or territory outside the Customer's country or region. The Customer agrees to ComputerTalk performing any such transfer of Customer Data to any such country and storing and processing the Customer Data to provide the services. The Standard Contractual Clauses located [here](#) will apply to Customer Data transferred outside the EEA, either directly or via onward transfer, to any country not recognized by the European Commission as providing an adequate level of protection for personal data (as described in the applicable Privacy Legislation).

Your data protection rights

ComputerTalk would like to make sure you are fully aware of your data protection rights. Every user is entitled to the following:

- The right to be informed. You have the right to know what data is being collected, how it is being used, how long it will be kept, and whether it will be shared with any third parties. We do this through this privacy notice.
- The right of access. You have the right to request ComputerTalk for copies of your personal data. This is called a subject access request. We must respond to your request within one month.



- The right to rectification. You have the right to request that ComputerTalk updates any inaccurate or incomplete data.
- The right to erasure. You have the right to request that ComputerTalk erase your personal data under certain circumstances.
- The right to restrict processing. You have the right to request that ComputerTalk restricts the processing of your personal data under certain circumstances.
- The right to data portability. You have the right to request that ComputerTalk transfer the data we have collected to another organization or directly to you under certain conditions.
- The right to object to processing. You have the right to object to ComputerTalk's processing of your personal data under certain conditions.
- The rights in relation to automated decision-making, including profiling. You have the right to object to having decisions made about you by automated processes or profiling.

To make a request to exercise one of the above rights, please contact dataprivacy@computer-talk.com. We will consider and act upon any requests following applicable data protection laws.

Changes to our privacy notice

ComputerTalk keeps its privacy notice under regular review and places any updates on our website. We encourage you to periodically review this privacy notice to learn how ComputerTalk protects your personal data.

Data Protection Officer

Our Data Protection Officer, Jennifer Sutcliffe, is responsible for overseeing what we do with your information and monitoring our compliance with data protection laws.

If you have any concerns or questions about our use of your personal data, you can contact our Data Protection Officer, Jennifer Sutcliffe, by writing to dataprivacy@computer-talk.com.

How to contact ComputerTalk

If you have any questions about ComputerTalk's privacy notice, the collection, storage, or processing of your data, or you would like to exercise one of your data protection rights, please do not hesitate to contact us:

Computer Talk Technology Inc.
150 Commerce Valley Drive West, Suite 800
Markham, Ontario, Canada, L3T 7X3
Telephone: 905-882-5000
Email: dataprivacy@computer-talk.com

How to contact the appropriate authority

Should you wish to report a complaint or feel that ComputerTalk has not addressed your concern sufficiently, you may contact the Information Commissioner's Office.

URL: <https://ico.org.uk/make-a-complaint/>

Telephone: 0303 123 1113

